Jim WB9LNU

August 8, 1994

Mr. John B. Johnston
Chief, Personal Radio Branch
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554-0001

Dear Mr. Johnston:

In response to the eight questions you asked the VECs at our Conference in Gettysburg, Pennsylvania on June 24, the Rules Committee asked all eighteen VECs to give us their individual comments. Each responding VEC was assigned a response number (#1 thru #9) which is used consistently for each question on which they offered comments. Attached for your consideration, are the unedited VEC recommendations pertaining to each of your specific questions.

The Rules Committee reviewed the VEC recommendations to the FCC and concluded that the best barometer of thinking on the part of VECs as a group can only be obtained by a comprehensive review of the complete report. Even where a consensus of thinking appears to prevail, justice cannot be given to the minority view without looking again with equal weight to all of the comments.

We want to express to you, on behalf of the entire VEC group, our appreciation for permitting us to comment on each of these important questions.

Respectfully submitted,

Win Guin

Rules Committee of the National Conference
of Volunteer Examiner Coordinators
Win Guin, W2GLJ, Chairman
Don Tunstill, WB4HOK, Vice-Chairman
Fred Maia, W5YI, Member

Attachments:

Question #1

We would like for you VECs that have been successful in protecting yourself against cheating scams will share your techniques with those who are having difficulties.

Response #1

"Protecting yourself from cheating scams is a problem. We have more than 900 different VE teams - and some 17,000 accredited examiners. Last year we administered more than 50,000 examination elements to some 30,000 applicants at more than 3,600 examination sessions. While percentage wise, the problem is small, it is nonetheless too high in terms of the time and expense it takes to investigate and resolve examination irregularities. Perhaps the Official Observer Corps - or the FCC's Amateur Auxiliary - could assist in some way. The difficulty with this is that sometimes self-enforcement can cause problems also - and is also resented by the VE team. We need to continually seek out - and weed out - less than desirable amateurs.

But we must be careful not 'to throw out the baby with the bath water'. The fact remains that the VEC System is one of the most successful and credible government programs ever in terms of up-to-date technology testing and savings to the taxpayer. Using FCC figures published in 1983, it cost the government $7.26 to examine an amateur radio service applicant. Considering inflation over the last decade, that cost would easily be double today. With 113,028 persons examined in 1993, the savings is more than $1.5 million annually."

Response #2

"Attempts at cheating scams with our VEC fall into the following categories:

Example: An amateur who is a professor in Physics thinks he is qualified to say who passes and who fails and that the exams are just a foolish formality. He has tried to pass Novices with no knowledge of the Morse Code and even taught a class which included his wife, whom he intended to test. We have corrected this by disqualifying the person as a VE.

We suspect that some have tried to pass the code test by having someone copy or remember it for them. We simply keep enough code tests on hand to prevent their taking the same test they were prepared for.

Concealed crib notes are fairly common. Our VEs are requested not to challenge a case except a flagrant one with solid evidence. The best way is merely to observe in such a manner as to prevent the person from using his notes. Without being obtrusive or unfriendly it is possible to let the person know he is being watched. Honest applicants welcome this.

We try to create a relaxed atmosphere of confidence and mutual trust. This probably helps most of all in preventing cheating."

Response #3

"Have better contact with VE teams. No way the two large VECs can control or know all of their VE teams. Encourage more smaller VECs. One large VEC does not get a copy of all examination papers and not even a copy of each certificate issued! Just how do they know for sure what was passed or if the CERTIFICATES were made out correctly?"

Response #4

"The best protection against cheating is for the VEC to know the VE teams and their leaders. Frequent visits, sometimes unannounced, are helpful in maintaining a high level of awareness and compliance with VE instructions. Multiple answer keys, changing examination booklets and CW texts frequently, and limiting attendance at examination sessions to only those examiners and examinees actually involved. No 'looky-lous' no matter whether they are accredited examiners or not. We have found that making one person (usually the examiner-in-charge) responsible for all examination materials both at the session and between sessions is very helpful."

Response #5

"Gears VEC has had no problem with VEs cheating because, as a 'small' VEC, we personally know each VE and they are carefully screened. The larger VECs seem to be in competition to have maximum numbers of VEs instead of putting an emphasis on quality and integrity. The large VECs need to establish regional review boards to personally evaluate VE candidates. None should be accredited by mail only."

Response #6

"A. Statistically the larger VEC operations would be most susceptible. That is, if an organization has ten times as many teams its probability of having scam problems would be ten times as likely.

B. The smaller VECs are more likely to be personally acquainted with the members of their teams and more likely to be able to monitor the team activities.

C. Larger VECs might find it desirable to establish regional representatives to monitor team activities."

Response #7

"We have encountered very little evidence of attempted cheating, however, in one case a VE discovered a man using a notebook computer containing exam questions and answers. His CSCE was canceled. Since then we purchased some non programmable calculators which we lend to those who come to the exams with programmable calculators."

Response #8

"We have found it effective to:

Speak to examinees before exam begins concerning security and advise our rules....in no uncertain terms.

Have one 'watch-person' for every 4 or 5 examinees....total saturation.

Have all exams individually numbered, and the number of the exam is recorded on examinee's answer sheet just before issuance to the examinee.

Keep all exams locked in suitcases at all times."

Response #9

"We don't know that we have been that successful in protecting against cheating, but we think our strength in that area is the level of communications we have with each of our VE teams, coupled with the fact that most of our teams are within 100 miles of the responsible coordinator. This is one of the major benefits of using more than one 'coordinating officer', each handling the area immediately contiguous, with the coordinators themselves physically separated by, in some cases, several hundred miles. This permits unexpected visits of the coordinator to a session in progress and in other ways enables the coordinator to do a better job of keeping his ear to the ground as to what is really going on. This also spreads the work load among volunteers, holding it to a level that it can remain fun, thus an perceived irregularity is given the attention it deserves. Should it ever cease to be fun, volunteers would simply volunteer to quit. Requiring the use of multiple designs of the same element at the same session helps too.

We believe a MAJOR WEAKNESS of the program is allowing a VE whose accreditation has been revoked by any VEC to perform at any level for another VEC. We can cite examples of the same person or group having been removed from activity from as many as FOUR VECs that are continuing to test through yet another VEC. Another citation could include the condition where the discrediting VEC notified other VECs of the action, only to have another VEC look upon the situation as a recruiting possibility and immediately accredit the individual involved! Because of that condition, we believe the prohibition should be set out in Part 97 in order to be unmistakably binding, and that the only manner of correction of this Achilles heel is to cause accreditation revocation of a VE by any VEC to disqualify the individual from the entire program. Of course, the window of reprieve must be left open so the VEC that revoked accreditation could restore that person to good standing in the program."

Question #2

We would like to know which rules in Part 97 will need to be changed in order for you to bring electronic filing on-line as soon as possible.

Response #1

"Electronic filing of amateur service applications will save even more money and bring better service to the public - a win-win situation. I do not believe that any of the rules concerning getting the FCC Form 610 data to Gettysburg really need to be changed since there is nothing in the Part 97 rules which specify that applications must be 'mailed' to Gettysburg. The rules - 97.511(e) & 97.519(b) mention 'submitting and forwarding' applications to Gettysburg. There is no requirement that an application be mailed.

We are planning to hire another data entry clerk to facilitate Electronic Filing. Our primary question concerns personnel payroll costs which appear certain to further escalate our costs above presently authorized expense reimbursement levels. Both the ARRL-VEC and W5YI-VEC costs exceed reimbursements. We need clearer guidelines as to what VECs may - or may not - spend and the source of these funds.

We also need access to the FCC's amateur operator on-line database - both current licensees and those within the grace period - if we are going to file essentially error-free application transmissions to the Commission. Human nature being what it is, some applications are difficult to read and if entered incorrectly, will fail the required FCC 'comparison check'. We need procedures in place that will permit the VECs to do as much of the comparison and inspection before the application data is actually transmitted."

Response #2

"We are anxious to go to electronic filing and are beginning a study now to learn how we can do so. At this point we don't see any obstruction in Part 97. We contracted today for MCI mail but it will be a few days before it is installed."

Response #3

"Not sure if any need to be."

Response #5

"Probably the most important and hardest to justify change concerns 97.509 (f). This requires that each administering VE certify on the examinee's application form (610) that the applicant is qualified. This implies a signature from each VE, which could not be transmitted electronically. Without these signatures, how would the VEs be able to certify the applicant's qualifications? The only way this could be done would be by FAX and this would not help at the FCC, since they would have to handle the FAX the same as any other paper form."

Response #6

" Part 97 changes related to electronic filing:

A. 97.519 (b) delete second sentence of this paragraph.

B. Change 97.519 (c) to 97.519 (d).

C. Insert a new paragraph 97.519 (c) as follows:

The coordinating VEC must screen and forward the essential information from all applications for qualified examinees within 10 days of their receipt from administering VEs. The information may be submitted by mail, on a floppy disk, or by electronic means. In either case, the data format must be compatible with FCC requirements. The 610 forms and examination records must be retained by the VEC for 15 months from the date on which it submitted the information to the FCC."

Response #9

"In 97.519(b) change 'applications' to 'information' and possibly add an [even optional] E-mail address. As to generally advisable changes to Part 97, may we suggest we would like to see a sentence somewhere in Part 97 saying that any action required by 'the examiners' by any requirement of these rules may be acceptably accomplished by the action of any one qualified examiner, acting with the concurrence of a 'Contact Examiner' with the exception of 97.509(a) [present and observing] 97.509(e) [grading] and here I would recommend a change from 'immediately grade the examinee's answers' to 'immediately grade the examinee's answers, or agree with the grading as done by another qualified administering VE.', and 97.509(f) 'When the examinee is credited for all examination elements required for a new or upgraded class of operator license, [it may be above, below, or THE class actually sought] the administering VEs must certify on the examinee's application form that the applicant is qualified for the specified class of license and report the basis for the qualification.' [that's where the 610 gets signed, and reword the present statement to certify that Part 97 of the Commission's Rules and the coordinating VECs instructions were complied with during the session] An affidavit from the contact VE applying to the entirety of the session and its necessary preparatory and following actions could additionally be a required content of the Session Summary, Manifest, or whatever the document ends up being called - or does the FCC want it included on the TEST REPORT that is forwarded to Gettysburg? It appears a common name of the document would be advantageous, so let's set it out in Part 97, then there will be no arguments. [At one time GLAARG & Smitty required 23 right for a passing grade on a Novice test because the regulations required 74%. They maintained 74% of 30 was 22.4 an that you didn't accomplish the required 74% until you had 23! We think that is the reason Part 97 now gives the passing grades in numbers of correct answers rather than percentages.]

This all-inclusive language would specifically apply to 97.505(a), [giving credit for elements other than those administered at this session], 97.505(c)....'prepared, or obtained from a supplier, by the administering VE according to instructions...' [Do all three administering VEs actually need to go to the mailbox? And what about the VE teams that are permanently stocked with supplies by their VEC and rotate the VE duties among themselves. Are supplies already on hand, in adequate protective custody or

other members of the same VE team, contaminated simply because the administering VEs for a particular session didn't assemble the test materials from a qualified source, and a strict interpretation of Part 97 as it is presently worded WOULD exclude other VE team members from the list of qualified sources?], 97.509(g) ' ...the administering VEs must return the application form to the examinee and inform the examinee of the grade.' - [Can't any one qualified VE {or an unaccredited administrative helper, for that matter} tell the examinee his grade, and should we REALLY be required to return the application to the examinee, when he is usually so interested in departing the scene that it would prove quite inconvenient?], 97.511(c) 'The administering VEs must make a public announcement before administering....' - [Surely any one administering VE could comply by causing an appropriate announcement to be made, whether by a VE or even a person not qualified to be a VE - a Technician class newsletter editor, for instance?], 97.511(e) 'Within 10 days of the administration of a successful examination for an amateur operator license, the administering VEs must submit the application to the coordinating VEC.'

[This should be changed to require the Contact VE (and not all three administering VEs) to submit the application to the coordinating VEC within the specified time.' Again, do ALL THREE physically need to go to the mailbox?]

Additionally 97.3 should have the definition of Contact VE added: SUCH AS: 'That person who serves as administrative leader of a VE team, normally conducting correspondence with the coordinating VEC and the general public concerning one or more Volunteer Examiner sessions, and certifies that the VE team he represents has complied with these rules, as well as the instruction from the coordinating VEC, in all respects. [Withholding that signature would have the effect of vetoing the entire session.] A contact VE may or may not be an administering VE at any given examination session.'

The contact VE is normally the person in custody of the examination material between sessions, often the ONLY person with such access. The contact VE would be the most likely suspect if a test was compromised by 'leaking' to a prospective examinee in advance of the session. This would more than likely be done well in advance of the session itself [to give the examinee ample time to commit to memory] and without the knowledge of possibly ANY ONE of the three administering VEs. The Contact VE is today, in reality, an integral, and unrecognized part of the VEC program as it has evolved. It is time he/she be held accountable for their personal actions, and that he/she be held responsible for reporting any known violations by the team members."

Question #3

We would like to know if the upward trend in late filings can be reversed, or whether the ten-day rule needs to be amended.

Response #1

"Late filings are not a problem at the W5YI-VEC. We have the best on-time record of any VEC considering the number of applications we file. The ten-day rule does not need to be changed. If anything, the ten-day period is too long. Our goal is to have amateur licenses issued within 24 hours of examination. And, we are working in that direction."

Response #2

"We have never had a late filing and thus cannot comment on this."

Response #3

"Ten-day rule is plenty of time."

Response #4

"As I understand it, the late filings are due mostly to the long delays in the time between the VE and the VEC. That is due to laxity on the part of the VEC. VECs should allow one late filing if it is backed up by a reasonable letter of explanation from the team leader. When a second late filing occurs, the VEC should insist on a new team leader or refuse to coordinate future sessions. This would do wonders. There is really no excuse for the VEC to be late, especially when electronic filing is implemented. I do not think a rule change is necessary."

Response #5

"The 10-day rule is acceptable. VEs need to be more considerate of the applicants and send in the exam results as quickly as possible so they can get their licenses quickly. The problem of late filing may relate to some of the VECs not screening VE applicants sufficiently for the desired qualities of integrity, dependability, and dedication."

Response #6

"Ten-day rule. We see no reason at this time for any change in the ten-day rule."

Response #7

"The 10/10 day rule is OK as is."

Response #8

"The 10-day rule works for us."

Response #9

"Not having had any late reports lately, we don't know the problem. Better answers can probably be provided by those experiencing the difficulty but we would submit, from an uneducated viewpoint, the real cause is lack of application of effort in a timely manner.

On another hand, let's look at the March, 1994 statistics that were mailed out recently. The ONLY late reports we see reflected are by ARRL and W5YI. By converting the % late filed into actual numbers late and consolidating to a total for each of them, we arrive at:

ARRL - 28 late reports out of 638 or 95.611285266% TIMELY FILED.
W5YI - 2 late reports out of 401 or 99.501246883% TIMELY FILED.

All other VECs were 100% timely with all reports during the month for an overall of 30 late out of 1,161 reports or 97.416020672% TIMELY FILED."

Question #4

We would like to know if the VEC system could assist in encouraging former hams who have dropped out of ham radio to return by allowing them to become licensed without re-passing your exams.

Response #1

" Yes, the VEC System could very easily check prior records provided by applicants who had inadvertently allowed their amateur license to lapse by more than two years. (After two years, all data including the applicant's call sign is purged from the FCC data base.)

A regular FCC form 610 would be submitted to a VE team along with evidence of a prior license. Box number 4A (Examination for a new license) would be checked - with the examination credited (by Rule amendment) in the case of a previously licensed amateur whose license had expired more than two years ago. Rule 97.19(c) would have to be amended to read: 'If a license expires, application for renewal may be made. A new call sign is assigned after a period of 2 years.' Section 97.505(1) 'Examination Credit' should be amended to read: 'An FCC-issued amateur operator license: The least elements required for the license held.' Remove only the words '...unexpired (or within the grace period)...'.

It would help if VECs had a way to determine that a license had indeed expired. Real time access to the FCC's on-line data base could provide this information.

In effect, the grace period is extended from two years to 'indefinitely'. After two years, however, the licensee would be assigned a call sign 'systematically'. The amateur could reapply for his previously held call sign through the 'Vanity Call Sign System' ,if available.

The VE team would inspect and approve the 'evidence' and submit the new application to the VEC. A photocopy of the 'prior evidence' would be

attached to the application for VEC review and concurrence. The regular VEC System 'expense reimbursement' fee would apply."

Response #2

"We don't understand question #4. What you seem to be suggesting is equivalent to eliminating the ten year limitation and making the license permanent for life (or beyond). We are opposed to this. People may vote after they are dead but there is no reason for them to have a ham license."

Response #3

"No way without retesting."

Response #5

"Any former ham who has dropped out of ham radio and has allowed their license to expire should be retested. No exceptions. Over the years the state of the art has changed, and so have the rules, so they need to study and be retested."

Response #6

"We believe that former hams should be treated as any other unlicensed person. Technology and rules have changed substantially over the years and they should be required to demonstrate current knowledge of both before resuming operating."

Response #7

"Those whose license has expired less than 5 years could be reinstated. The others should pass an exam on laws, rules and regulations, 20 multiple choice questions should suffice."

Response #8

"No."

Response #9

"While we would have no reservation about assisting in the renewal of amateur licenses that are now expired past the grace period, why do you need our help? Simply honor a request for renewal without regard to the expiration date [past or future] of the license involved. Should you wish to also get this handled by electronic means, thus bringing the VECs into the path of information flow, we would have no problem in doing that also, however, like the 'grandfathered' Technician who submits a PHYSICIAN'S CERTIFICATION OF DISABILITY' and advances to General class without examination, we think that if a renewal came through the VEC system, we would be entitled to a cost recovery fee.

While our time may well be volunteered, the rest of our operation costs real dollars - i.e., telephone , E-mail charges, postage, printing, etc. These

overhead expenses are lessened by an unmeasurably minute amount by the lack of administering an element, in that he would not use an answer sheet. It would appear to us all other costs would be the same as for someone we actually tested. We cannot operate without income from some source of an amount adequate to pay these items, and we are in a small group of up to eight medium sized (if ranked by volume of activity) VECs who are financed by cost recovery fees ONLY (Anchorage?, CAVEC, GLAARG?, Koolau?, Laurel, Milwaukee, Sunnyvale, and WCARS/VEC). The two largest VECs, while they carry the largest load, are financed by publication sales and are actually using the VEC program as a loss leader. If we can't collect enough to pay our ordinary and necessary expenses, we cannot continue to exist in the manner of our past. Of course, the two big VECs will be more interested in the related publication sales than in a cost recovery fee, while the smaller VECs (Anchorage?, Charlotte, GEARS?, GLAARG?, Jefferson, Koolau?, Milwaukee Mountain, PHD, Sandarc, Triad) who are sponsored by one or more full service Amateur Radio clubs will acquiesce to the absence of fee as an item not really affecting them. We further believe the group of medium VECs as defined are operating more closely to the concept visualized at the inception of the program than the members of either of the other two groups. If the FCC is looking for any opportunity to reduce the number of VECs, requiring the actual administration of an examination is a golden opportunity.

We also think it is only fair to point out that unless there is a clarification of the applicability of fees in regards to the Novice testing, the present condition will be interpreted to mean a VEC can do as it damn well pleases in regard to applicability of fees, to the enhancement of the two largest VECs and the detriment of all others, particularly the medium sized VECs for the reason enumerated."

Question #5

We would like to know your preference as to whether Part 97 should be amended to conform the rules to Form 610, or whether Form 610 should be revised to conform it to the rules. Or maybe you would prefer some combination of form changes and rules changes.

Response #1

"It is far easier to change the FCC Form 610 to conform to the Rules than it is to amend Part 97. There is currently no reference to the 2-year grace period on the FCC Form 610 - but there is in the Rules. The current FCC Form 610 treats all license 'Reinstatements' as a simple 'Renewal'."

Response #2

"We think that, since the Tech Plus license is already being issued, it should continue. A temporary discrepancy in the rules does no harm and sometimes it is necessary. Bring Part 97 in line with what is being done, not the other way around."

Response #3

"I did not like to see elements applicant did not have to take and elements passed dropped from the 610. This in noway would make for more paper work for the FCC."

Response #4

"Neither Part 97 nor the Form 610 needs to be changed. If the VEC community feels it is necessary to have a sixth license class (TECH PLUS) or it is necessary to change the VE certification then something would have to be done. I am in favor of working around these problems as stated elsewhere in our comments."

Response #5

"The Form 610 has been recently changed by the FCC. The new form is a time saver. It is simple and easy to fill out. Change Part 97 to conform to the new Form 610."

Response #6

"Part 97 should define Tech Plus license and its privileges. Our recommendations regarding 610 form/license document are as follows:

Modify the Form 610 and/or the wallet-sized license form so that a portion of the front page of the 610 form and the license are identical. With this arrangement, an applicant for renewal or for upgrade could attach a copy of his/her license as an overlay on the front of the 610 form if there are no changes in the information appearing on the license. If there are any changes, then the front of the 610 form would be completed by the applicant in the appropriate blanks and the existing license attached to the rear of the 610 form as they presently do.

Also, information about the license should appear on the face of the license in a bar-code format. The presence of the bar code on the front would permit an FCC processor at Gettysburg to verify the applicants status with a minimum effort as well as reducing the time needed to process an application. The presence of Bar-code information duplicating the printed text on the face of the license could also be helpful in spotting fraudulent applications."

Response #7

"Changes should not be made at this time."

Response #8

"This is the BEST 610 we have ever had. DO WHATEVER IT TAKES TO KEEP IT....and leave it alone"

Response #9

"The more detailed Part 97 becomes, the more regimented the program becomes. We are convinced that we get the best performance from a VE by allowing · ANY PERMISSIBLE PROCEDURE THAT RESULTS IN A RESPECTABLE PROGRAM. Volunteers work hardest to accomplish a task in the manner THEY believe to be best. The more restrictions, the less enthusiasm displayed, the quicker burnout occurs, the more hesitation for volunteering in the first place, the greater the temptation to use volunteers we would not otherwise accredit, all to the detriment of the program in general. Please give us all the latitude possible. It is our considered opinion the VEC program has earned a degree of flexibility above that which might have been expected when the program started."

Question #6

We would like to know whether you want the FCC to require your VEs to certify that they personally administered the examination, or if you want each VEC to decide for itself.

Response #1

" The W5YI-VEC does NOT want the FCC to require certification that the three VEs personally administered all examinations. We handle all examinations at large hamfests via an assembly line process. That is, the Contact VE (the supervising Examiner-in-Charge) assigns VEs to various testing functions. Applicants are frequently tested by more than three VEs, but only three VEs certify the application. Frankly, we prefer adoption of the WCARS petition recognizing the widespread practice of having a VE team supervisor who is responsible for examination integrity."

Response #2

"We absolutely require that all three VEs be present for the entire exam. We will disqualify any VE who is not. We appreciate the backing you give us in Part 97.509(a). The 610 is OK as is."

Response #3

"All VEs should certify they personally administered the examination. To be left up to each VEC would only open up the possibility of more cheating."

Response #4

"Certification made by VEs on the Form 610 was changed with the issuance of the new form March '94. The examiner is certifying that he/she has complied with the following:

a) Part 97 rules governing VEs; and
b) Instructions provided by the coordinating VEC; and
c) Instructions provided by the FCC.

Whether or not the VEs are required to personally administer the examination depends on what instructions the VEC has given to the VEs. To the extent that the VE instructions reflect the 'Instructions for Volunteer-Examiner Coordinators' then FCC instructions to the VEs are covered. There are no specific instructions to VEs contained in the Form 610 instructions.

The only danger with this arrangement occurs when the VEC fails to give formal instructions to the VEs. In that case the VE can do whatever suits him/her.

All in all it is better for the VECs to control their own destiny. In most matters I prefer government with a small 'g' over Government with a capital 'G'."

Response #5

"The FCC should require the VEs to certify that they personally administered the examination. The VEs are the ones that administer the tests, so they should certify this fact. This puts the responsibility where it belongs, with the VEs. Don't let the VECs decide individually -- we need more uniformity among the VECs."

Response #6

"We believe that existing rules are sufficient in this regard."

Response #7

"We feel 'administered' should be changed to 'observed'. The VEC should decide for itself on this subject.

An important question relating to the exams is 'who signs the 610 form when you have 3 VEs giving a code exam at one end of a large room, and 3 VEs giving written exams at the other end'? Many examinees take both code and written exams at the same session and there is room for only 3 VE signatures on the 610."

Response #8

"Let each VEC decide."

Response #9

"For reasons given in our response to Question #5, we DO NOT want the FCC to require certification that the three VEs personally administered all examinations."

Question #7

We would like to know if you want to make the Tech Plus a class of operator license and if you do, we want to know your best case for doing so.

Response #1

"There is no reason to make Tech Plus a separate class of license. Rule making takes time and, in this case, is completely unnecessary. The W5YI-VEC prefers that the words 'Tech Plus' remain on the license (as it is presently being handled). But the 'Plus' should be thought of as an endorsement on the Technician Class license - in much the same fashion that a 'Radar Endorsement' extends the authority of the General Radiotelephone Operator License (GROL.) The Radar Endorsement is NOT a separate license.

No rule changes are needed at all. Section 97.301(e) already provides for additional privileges for the Technician Class operator who holds a telegraphy element CSCE. The 'Plus' endorsement on the Technician license is FCC recognition of that CSCE."

Response #2

"The Tech Plus is OK.- see question #5 Response #2"

Response #3

"It is my understanding the FCC made the Tech Plus a separate class of license. At least it's on the 610 and the FCC is issuing a Tech Plus License. What is the question?"

Response #4

"There is no reason for the FCC to issue a Tech-Plus license. Their dilemma currently is that they are printing a class of license on the Form 660 (the license document) which is not supported in Part 97. The solution to this is simple: they should print NOVICE & TECHNICIAN which indicates the person entitled to the privileges of both classes.

Whether or not to change the present 610 is up to the FCC. It seems to me that they could leave the boxes in Item A of Section 2 alone. It is well understood in the VE/VEC community that TECHNICIAN PLUS means TECHNICIAN PLUS NOVICE privileges.

I can't believe that this would present an insurmountable problem for their key entry people. They would simply punch in 'TECH PLUS' and the software would print TECHNICIAN PLUS NOVICE on the license. This could be shortened to NOV & TECH or NOV/TECH if they have a field width problem."

Response #5

"The FCC has already decided this, since they are now issuing either a Technician or a Tech Plus license. They need to be separate licenses so the VE team knows for sure what privileges such licensees hold; also, a Technician licensee who later passes element 1A would not have to retain a CSCE forever, to prove it. Separate licenses also may help eliminate the temptation for Technician license holders to operate as Technician Plus operators."

Response #6

"Yes, this is a de facto item and should be formally recognized in Part 97."

Response #7

"We believe there are some Tech's now using their Tech/General calls illegally on Novice and General frequencies. Perhaps making Tech Plus a class of operator license with a different call would help, but it would also make the licensing structure more complicated."

Response #8

"Yes. Because the FCC **SHOULD** issue A Tech Plus License or eliminate Codeless Tech."

Response #9

"If Tech Plus were made a class of license, all doubt would be removed as to HF operating privileges and the eligibility for acceptance of a PHYSICIAN'S CERTIFICATION OF DISABILITY in lieu of administering either Element 1B or 1C, or both.

It would appear to us, now that the FCCs computer does in fact have capability for handling it, there is really no credible reason not to do so. So what if it creates a sixth class of license, we have the condition now, and it deserves differentiation in an authoritative and recognizable manner."

Question #8

We would like to know whether the VECs want to revise the operator class structure in some way to agree with ITU code no-code in the direction of CEPT and CITEL.

Response #1

"Yes, a two-class system would eventually be appropriate. There is simply no need for eight different written and telegraphy examinations. The Federal Communications Commission should not be in the education business. Their responsibility is to identify individuals who are qualified to access the people's frequencies and to maintain spectrum order.

Twenty-five years ago, the higher class licenses were associated with what was thought to be higher technology privileges. Today, that is not the case. Nearly all progress of communication technology now is at the VHF and higher frequency level. The high frequency band, (i.e., 3 to 30 MHz) as a rule, is the home of what is fast becoming antique technology. The beginning 'day one' amateur today can obtain all VHF and higher frequency spectrum by passing two short and simple multiple choice examinations. There is no relationship today between the various license classes and the direction of futuristic communications technology. The higher ham classes yield lower class technology access.

It thus appears appropriate to eventually have two classes of license, a (Class 2) 30-MHz and up no-code and a (Class 1) all band license. We may want to consider a single class amateur service license once the international telegraphy constraints for ham band operation are abolished - as surely they will be. History has shown that the amateur community as a group is opposed to major change - no matter what the change is.

The two class system should be phased in and the current 5 classes phased out in four years so as to have minimum impact on the publishing community who have invested heavily in the four year study material selling cycle. Perhaps the Extra, Advanced and General Class could be merged into a Class 1 license in July 1998. The Novice and Technician Class could be merged into a Class 2 license in 1997, the current implementation date for updated Novice and Technician Class study material. A Class 2 'Plus' endorsement could be available for amateurs who have passed a telegraphy examination.

Examination requirements for a Class 2 license would be 100 multiple choice questions which emphasize VHF and higher frequency operation. A 12 words-per-minute telegraphy examination and a 50 question HF oriented examination would yield all band operation. There would only be two written and one telegraphy examination to administer. This is also the current examination requirement in Canada."

Response #2

"We haven't studied the international concepts and problems sufficiently to give an opinion. What appeals to us personally is for the United States to use its own system but to cooperate as fully as possible with other countries."

Response #3

"Leave it alone or possibility drop the 20 WPM Code and Advanced Class license. Five VECs are to administer examinations and nothing else. Stay out of rule making. Would be a conflict of interest."

Response #5

"The two-class system of CEPT and CITEL is not appropriate for U.S. amateurs. Our present structure gives applicants a logical stair-step approach to achieving a higher class of license. It also develops an incentive in most licensees to try to achieve a higher class of license. With a 2-level system, where is the incentive to gain more knowledge and achieve better operating practices?

We believe the VECs should take a position against license class simplification to a two-class system. Also, we see considerable impact on the FCC, VECs , publishers, and question pool development; however, we would need sufficient time to formulate our comments on those matters."

Response #6

"It is not clear, to me, the conditions surrounding the CEPT and CITEL concepts. Is the intention to equalize the licensing process in the signatory countries, or is it meant to establish procedures for amateurs temporarily visiting other countries? Let me deal with the two concepts separately.

A. Visitor operating privileges. Since relatively few amateurs travel from country to country with the idea of operating in other countries. No major restructuring would seem to be called for. I would recommend that novices, technicians and tech plusses from this country be considered as CEPT Class 1 to operate above 30 MHz. All other classes to have HF privileges. The major fallacy of the CEPT agreement will be the International mode assignments. Most, if not all, other countries have established their phone allocations to avoid conflict with our phone band assignments.

B. If, on the other hand, the intention of these agreements are to equalize the license structures in the signatory countries, then the problems could be much more severe.

Our process is one of gradually increasing privileges coupled to increasing skill levels. If a single level for all HF licensees were to be established, then the decision would have to be made as to the skill level requirement. Too low a level would make amateur radio into another CB fiasco. On the other hand, if a higher level were mandated, then many people would be discouraged from participating. Similar conditions apply to code requirements.

In regard to this subject, we should like to make the following additional observations:

1. We would not like to see the present system changed to the two-class system. The present (or similar system) permits progressive growth within our amateur community.

2. We think the impact of license simplification is fully dependent on the character of the 'simplification'. Suffice to say that growth at the expense of quality is, in our opinion, not an acceptable trade-off.

3. As implied in our comments, requiring all HF applicants to pass the advanced class examination would improve the quality of skill level in the amateur community but it would most certainly diminish growth. An extra class licensee should have sufficient knowledge to maintain his/her own equipment if necessary and the skills needed to operate it properly. A technician must fundamentally know the rules of the road - regulations and basic operating procedures.

4. As to how the amateur community would react to change, the new no-code licensees will accept any change which makes it easier (read less effort) to gain more privileges. Higher class licensees will more likely oppose such a change since they have a better understanding and appreciation for the value of greater knowledge. Frankly, we see the term 'fear of the future syndrome' as inappropriate. We prefer to view the reaction of people to opposing the 'simplification' change as the result of increased maturity after having learned from experience that most 'changes' are not necessarily beneficial.

5. We believe the VECs should take a position on license class simplification only if we are able to arrive at a strong consensus. The key question we need to ask ourselves is whether this proposed 'simplification' is one of reducing the licensing structure or is it to make it 'easier' for no-code technicians to gain more privileges?

6. And finally as to the license structure and its impact on publishers, we would expect to see possession of a Class 1 license as a prerequisite and a combination of our current elements 3B and 4A (75 questions) plus a 15 WPM code test. For Class 2 the test should include our present elements 2 and 3A (55 questions). It would also seem feasible to retain the 4-year cycle by revising each level in alternate even numbered years."

Response #7

"Agreement with the ITU code should be undertaken together with simplification of the ham structure. We believe there should be 3 classes of license, basically:

A. Technician (55 questions same as existing no-code Tech) and with same operating privileges as present no-code Tech.

B. General (5wpm + 60 questions from elements 2, 3A, and 3B pools) privileges would be the same as present General class.

C. Extra (15wpm + 90 questions from 4A and 4B pools) privileges would be the same as present Extra privileges.

All existing licenses to be grandfathered, with no new Novice, Tech Plus, or Advanced issued."

Response #8

"No."

Response #9

"While we would strongly encourage participation in CEPT and CITEL, we do not believe revision of our present licensing structure is a prerequisite. We suggest leaving the six classes of licenses outstanding [that assumes Tech Plus will be a class in all respects] and make a decision as to whether or not 5 WPM truly demonstrates proficiency in Morse Code for purposes of unlimited HF privileges that would be conveyed in other participating countries. We do not think the retention of our present number of classes of licenses would prove a detriment to growth of the service. While the number of licenses outstanding continues to grow, it has been our experience that the ACTIVE AMATEUR POPULATION is in fact an itinerant group that blossoms with activity upon gaining a licensed conditioned, often touching off an effort of several months or even a few years of application of intelligence to accomplish an acceptable level of licensing, many times followed by burnout and its INACTIVITY, EVEN TO THE POINT OF LICENSE LAPSE. If the number of classes of licenses were reduced, the length of the described

application of intelligence would be reduced, burnout would occur quicker, and the number of ACTIVE amateurs might actually decrease.

As a second point, unless the VE activity is kept at or above its present level, many of the medium sized VECs as set out above will cease operations. It is our considered opinion this would already have evidenced itself except for NO CODE, which saved the financial life of several VECs. To reduce the number of classes of licenses will operate to the financial detriment of the medium sized VECs to the degree that several would throw in the towel."